

Date: March 20, 2001

DSL-BQA-01-013

To: Home Health Agencies

HHA 06

From: Jan Eakins, Chief
Provider Regulation & Quality Improvement Section

cc: Susan Schroeder, Director
Bureau of Quality Assurance

Outcome and Assessment Information Set (OASIS) Update

The purpose of this memorandum is to provide you with information related to:

- Correction policy for OASIS data item M0825.
- Considerations for home health agencies (HHAs) seeking initial certification.
- Application of OASIS requirements to Medicare beneficiaries.
- Implementation of Outcome Based Quality Monitoring (OBQM) Reports in survey process.
- OASIS training opportunity for providers in April 2001.
- New OASIS Correction Policy to be implemented April 2001.

Correction Policy for OASIS Data Item M0825

On February 22, 2001, HCFA published a policy that allows HHAs to make a non-key field correction to their original assessment at M0825 to update the Home Health Resource Group (HHRG).

Increase or decrease in therapy with no clinical change in patient's condition

If the therapy need was under-estimated or over-estimated at the beginning of an episode of care

and if there is no clinical change in the patient's health status, the HHA may correct the original assessment at M0825 to update the HHRG and transmit the corrected assessment to the state. The HHA may then cancel the original Request for Anticipated Payment (RAP) and resubmit with the correct HHRG. The HHA must document in the patient's record the difference between therapy originally estimated and therapy actually delivered.

Significant Change in Condition (SCIC)

If the physician orders therapy services for a patient who had no therapy ordered at the start of care (SOC), the change in physician orders and in the home health resource group (HHRG) constitutes a SCIC. The HHA must complete an Other Follow-up Assessment (RFA 05) and submit the SCIC adjustment. Corrections to the SOC assessment are not appropriate in this case.

Changes must be documented in the clinical record.

Time limit

Currently, HCFA has not put a time limit on corrections. Corrections can be made whenever the agency identifies the error and submits a corrected record through the OASIS correction policy.

Reference

The exact text publicizing this correction policy can be found in PPS/OASIS questions/answers 23 and 24 on the following HCFA website: <http://www.hcfa.gov/medicaid/oasis/hhqcat12.htm>

OASIS Considerations for HHAs Seeking Initial Certification

The Bureau of Quality Assurance (BQA) received the attached memorandum, Ref. S&C 01-02, dated February 2, 2001, from the federal Health Care Financing Administration (HCFA), Survey and Certification Group. This memo provides guidance to HHAs seeking initial certification concerning OASIS requirements and payment under Medicare.

Application of OASIS Requirements to Medicare Beneficiaries

The BQA received the attached memorandum, Ref. S&C 01-03, dated February 12, 2001, from the federal HCFA, Survey and Certification Group. The memo provides guidance to HHAs and state survey agencies for the application of OASIS requirements to Medicare beneficiaries using various Medicare benefits.

Implementation of OBQM Reports in Survey Process

The BQA received the attached memorandum, Ref. S&C 01-06, dated March 6, 2001, from the federal HCFA, Survey and Certification Group. This memo provides instructions to state agency and federal surveyors on implementing the OBQM Case-mix and Adverse Event Outcome Reports as part of the HHA survey process.

The information in this memo is effective immediately. HHAs should review this information to understand the following in relation to OBQM reports:

- HHA responsibilities.
- The survey process.
- Privacy Act and confidentiality requirements.

OASIS Training Opportunity

The Bureau of Quality Assurance will be presenting an **OASIS – Step Beyond The Basics** workshop in April 2001. The workshop is intended to provide advanced information for home health agency staff who work with and have a basic understanding of OASIS.

Workshop dates and locations

The workshop will be held on the following dates at three different locations:

- April 18, 2001 – Best Western Midway Hotel, Eau Claire.
- April 24 – Olympia Conference Center, Oconomowoc.
- April 26 – Comfort Suites of Green Bay, Green Bay.

Training brochure and registration form

HHAs may obtain a detailed training brochure and registration form in one of the following ways:

- A brochure and registration form is attached to this memo.
- A brochure and registration form was mailed to all Wisconsin home health agencies.
- Training information is available on the State OASIS System Welcome Page by clicking on *Bulletins*.

Further information on training

Contact Leann Graffin, Training Officer, at (608) 267-1438, for further information on the OASIS workshops.

New OASIS Correction Policy

The spring release updating the State OASIS System will include a process for removing erroneous OASIS records and making key field changes to records that have been accepted by the state. Starting with Version 1.20 of the OASIS data specifications, users will be able to remove a record that was submitted in error using an automated process called inactivation. Version 1.20 is scheduled to be implemented April 2001.

The current CORRECTION_NUM method will continue to be used for modifying OASIS non-key field errors. However, if an error has been made in one or more key fields or if an OASIS assessment was submitted in error, then the erroneous assessment should be inactivated. Home health agency's internal OASIS software programs should have the ability to create an inactivation record.

The OASIS – Beyond the Basics training program mentioned previously will include an Automation Track that will discuss the inactivation process.

Questions

Please direct questions to the following resources:

Software and OASIS data transmission:

- Chris Benesh, OASIS Automation Coordinator, 608/266-1718 or benesce@dhfs.state.wi.us.

- Cindy Symons, OASIS Technical Analyst, 608/266-9675 or symonc@dhfs.state.wi.us.

Clinical issues regarding OASIS data collection:

- Andrea Henrich, OASIS Education Coordinator, 608/267-3807 or henriam@dhfs.state.wi.us.

General home health questions:

- Barbara Woodford, Nurse Consultant, 608/264-9896 or woodfa@dhfs.state.wi.us.

Medicare payment and billing questions:

- Medicare Provider Relations at United Government Services, 1-877-309-4290.

Attachments